Privacy Policy – Russian Masters Ballet

Last updated: October 2026

1. Who processes your data

RUSSIAN MASTERS BALLET ("RMB") is the brand of two entities. Each is the **data controller** for the activities it organises:

- **Asociación Nacional de Ballet Profesional** (ANBP), tax ID G73821035.
- **RM BALLET S.L.U.**, tax ID B75828343.

The contract or registration for each programme states which entity organises it. Website, newsletter and general enquiry data are processed by ANBP. The registered addresses of both entities are in the Legal Notice of the website.

Data protection contact: info@russianmastersballet.com.

This policy applies to russianmastersballet.com, online.russianmastersballet.com and the registration platforms we use (CampSite and Timify).

2. What data we process

- **Identification and contact:** name, surname, email, phone, country and city of the contracting party and the participant.
- **Student data:** date of birth, ballet school, level, group, programme and course; audition results and audition videos.
- **Travel and accommodation documents**, only when needed (for example, for accommodation registration, insurance or a visa).
- **Health:** allergies, injuries or treatments that the family tells us about, so we can look after the student.
- **Images and videos** of classes, rehearsals and galas.
- **Payment and invoicing:** amounts, invoices and bank transfer details. Card details are handled only by the payment gateway; RMB never sees them.
- **Browsing:** IP address and cookie data (see the Cookie Policy of the website).

Fields marked * are mandatory: without them we cannot handle the registration or enquiry.

3. Why we use your data, on what legal basis and for how long

Purpose	Legal basis (GDPR)	Retention
Answering enquiries from the website, email or social media	Legitimate interest in answering the request (Art. 6.1.f)	As long as needed to answer, and at most 1 year
Auditions and selection (including videos)	Pre-contractual steps at the person's request (Art. 6.1.b)	Until the next season; videos only for the audition year and the following one

Purpose	Legal basis (GDPR)	Retention
Registration, contract and organisation of the course, accommodation and travel	Performance of the contract (Art. 6.1.b)	During the course and 5 years afterwards (limitation period, Art. 1964 Spanish Civil Code). Travel and identity documents are deleted when the course closes
Invoicing and accounting	Legal obligation (Art. 6.1.c)	6 years (Art. 30 Spanish Commercial Code)
Health data provided by the family	Explicit consent (Art. 9.2.a) and, in an emergency, vital interest (Art. 9.2.c)	Deleted when the course closes, unless an incident is open
Historical student record (name, date of birth, course, year, level) to reissue diplomas and certificates	Legitimate interest (Art. 6.1.f)	Indefinitely, with minimal data and restricted access
Photos and videos to promote our activities	Consent (Art. 6.1.a), given in the contract with YES / NO	Until consent is withdrawn
Newsletter and information about new courses	Consent (Art. 6.1.a); for former students, legitimate interest in informing them about similar courses (Art. 21.2 Spanish LSSI)	Until you unsubscribe (link in every email)
Social media advertising to existing contacts (custom audiences)	Legitimate interest (Art. 6.1.f); you can object at any time	Until you unsubscribe
Legal obligations (child protection, insurance, public authorities)	Legal obligation (Art. 6.1.c)	As required by each law

We do not take automated decisions or create profiles with legal effects on you.

4. Minors

Most of our students are minors. Their data are provided and authorised by their parents or legal guardians, who sign the contract. Children under 14 may not give us their data without their parents' or guardians' consent (Art. 7 Spanish LOPDGDD). We only ask for the data the course requires. Staff working with minors sign a confidentiality commitment and hold a clear sexual-offences record certificate.

5. Health data

We ask for health information only to look after the student (allergies, injuries, medication). Only the people who need it during the course can see it, and it is deleted when the course closes. In an emergency we may share it with medical services.

6. Images

Photos and videos are taken in classes, rehearsals and galas. In the contract you choose YES or NO to their use for non-public activities. Public galas are always recorded. If you authorise it, images may be published on RMB's websites, social media and materials, and may also be used by the teachers and artists authorised by RMB to present their teaching and artistic work in connection with Russian Masters Ballet. Material from

public galas may be used by RMB and its teachers and artists. You may withdraw consent for new uses at any time.

7. Who we share your data with

We do not sell your data. We only share it when necessary:

- **Public authorities** (tax agency, social security, authorities) and **banks**, as required by law.
- **Insurers**, for course insurance.
- **Course accommodation and transport providers**, for guest registration and transfers.
- **Between the two RMB entities**, only when they organise a programme together.

The following providers also process your data on RMB's behalf:

Category	Provider	Country
Course registration, contracts and payments	CampSite.com Inc.	USA
RMB Online bookings and payments	TerminApp GmbH (Timify)	Germany
Live online classes	Zoom	USA
Payments	Redsys, Stripe, PayPal	Spain / Ireland / Luxembourg
Website hosting	IONOS Cloud S.L.	Spain
Document storage	Dropbox International	Ireland (with transfer to the USA)
Newsletter	Mailchimp (Intuit)	USA
Digital marketing	Marketerweb LLC	USA
Accounting, tax and payroll	Tax, accounting and employment advisors	Spain
Occupational risk prevention	ESOC Prevención	Spain
Administration, communication and coordination	RMB collaborators and remote staff	Several countries, inside and outside the EU (for example, Russia, Ukraine, the United States, Paraguay or Bulgaria)

8. Transfers outside the European Economic Area

Some providers and collaborators are outside the EEA. Where the country has no European Commission adequacy decision, the transfer is protected by EU standard contractual clauses or, where the company is certified, by the EU-US Data Privacy Framework. Transfers needed to run a course outside the EU (for example in St Petersburg, Burgas or Shanghai) are based on the performance of the contract you request (Art. 49.1.b GDPR). You can request a copy of the safeguards at info@russianmastersballet.com.

9. Your rights

You may request at any time:

- access to your data;
- rectification of inaccurate data;
- erasure ("right to be forgotten");
- restriction of processing;
- objection, including to receiving marketing communications;
- portability;
- withdrawal of your consent, without affecting processing carried out before.

Write to **info@russianmastersballet.com** stating which right you are exercising. If we cannot verify your identity, we will ask for additional information. We reply within one month. Parents or guardians exercise the rights of children under 14.

10. Complaints

If you believe we have not handled your data properly, you can complain to the **Spanish Data Protection Agency** (www.aepd.es). We would appreciate it if you contacted us first so we can try to solve it.

11. Security and changes

We apply technical and organisational measures to protect your data: access limited to those who need it, passwords and encryption, staff training and confidentiality commitments. If we change this policy, we will publish the new version with its date and, if the change is significant, we will let you know.

In the event of any discrepancy between language versions, the Spanish version prevails.